

## REMARKS

Claims 26-31 are pending in the present application. Claim 26 is amended. Claims 30 and 31 are added. Reconsideration of the claims is respectfully requested.

### **I. 35 U.S.C. § 102, Anticipation**

The Office Action rejects claims 26-29 under 35 U.S.C. § 102 as being clearly anticipated by Batchelder (US Patent No. 5,472,502). This rejection is respectfully traversed.

Batchelder teaches an apparatus and method for spin coating wafers and the like. More specifically, Batchelder teaches a housing **1102A**; a chuck **306-11** located within the housing, wherein the chuck is configured to hold the substrate for processing and wherein the substrate may be spun using the chuck; an inlet **310A** within the housing, wherein the inlet is configured for connection to a source; and a dispenser **312C**, wherein the dispenser is configured to receive a solvent and introduce the solvent into the housing.

Claim 26, as amended, recites:

26. An apparatus comprising:
- a housing;
  - an opening in the housing configured to pass a substrate into the housing;
  - a chuck located within the housing, wherein the chuck is configured to hold the substrate for processing and wherein the substrate may be spun using the chuck;
  - an inlet within the housing, wherein the inlet is configured for connection to a source for a precursor silica solution and wherein the inlet is configured to deposit the precursor silica solution onto the substrate held by the chuck and wherein a film of the precursor solution may be formed on the substrate; and
  - a filter unit, wherein the filter unit is configured to receive a catalyst and introduce the catalyst onto the wafer in a uniform manner such that the catalyst becomes homogeneously diffused into the film, **wherein the filter unit includes a dispense head that dispenses the catalyst and a vapor distribution unit that uniformly distributes the catalyst.**  
[emphasis added]

Batchelder teaches a dispensing head, but fails to teach or suggest a filter unit that includes a dispense head and “a vapor distribution unit that uniformly distributes the catalyst,” as recited in claim 26.

Since claims 27-31 depend from claim 26, the same distinctions between Batchelder and the invention recited in claim 26 apply for these claims. Additionally, new claims 30 and 31 recite other additional combinations of features not suggested by the reference. Consequently, it is respectfully urged that the rejection of claims 26-29 is overcome.

The Office Action rejects claims 26-29 under 35 U.S.C. § 102 as being clearly anticipated by Mandal et al. (US Patent No. 5,670,210). This rejection is respectfully traversed.

Mandal teaches an apparatus and method for uniformly coating a substrate. More specifically, Mandal teaches a housing **14**; a chuck **12** located within the housing, wherein the chuck is configured to hold the substrate for processing and wherein the substrate may be spun using the chuck; an inlet **54** within the housing, wherein the inlet is configured for connection to a source; and a dispenser **20**, wherein the dispenser is configured to receive a solvent and introduce the solvent into the housing. However, Mandal also fails to teach or suggest a filter unit that includes a dispense head and “a vapor distribution unit that uniformly distributes the catalyst,” as recited in amended claim 26.

Since claims 27-31 depend from claim 26, the same distinctions between Mandal and the invention recited in claim 26 apply for these claims. Additionally, new claims 30 and 31 recite other additional combinations of features not suggested by the reference. Consequently, it is respectfully urged that the rejection of claims 26-29 is overcome.

Therefore, the rejections of claims 26-29 under 35 U.S.C. § 102 are overcome.

Furthermore, Batchelder and Mandal do not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. Absent the examiner pointing out some teaching or incentive to implement Batchelder or Mandal with a filter unit including a mesh unit, one of ordinary skill in the art would not be led to modify the applied references to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify the

applied prior art in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the applicants' disclosure as a template to make the necessary changes to reach the claimed invention.


**II. Conclusion**

It is respectfully urged that the subject application is patentable over the applied prior art and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: Dec. 31, 2012

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephen R. Tkacs', is written over a horizontal line.

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## APPENDIX OF REDACTED CLAIMS

Please amend claim 26 as follows:

26. (Amended) An apparatus comprising:

a housing;

an opening in the housing configured to pass a substrate into the housing;

a chuck located within the housing, wherein the chuck is configured to hold the substrate for processing and wherein the substrate may be spun using the chuck;

an inlet within the housing, wherein the inlet is configured for connection to a source for a precursor silica solution and wherein the inlet is configured to deposit the precursor silica solution onto the substrate held by the chuck and wherein a film of the precursor solution may be formed on the substrate; and

a filter unit, wherein the filter unit is configured to receive a catalyst and introduce the catalyst onto the wafer in a uniform manner such that the catalyst becomes homogeneously diffused into the film, wherein the filter unit includes a dispense head that dispenses the catalyst and a vapor distribution unit that uniformly distributes the catalyst.

Please add the following new claims:

--30. (New) The apparatus of claim 26, wherein the vapor distribution unit is a mesh unit.

31. (New) The apparatus of claim 30, wherein the mesh unit is made of a polytetrafluoroethylene material.--